

Hearing Date: July 25, 2018, 9:30 a.m. (Atlantic Standard Time)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA  
Title III

as representative of

No. 17 BK 03283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*

(Jointly Administered)

Debtors.<sup>1</sup>

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**INFORMATIVE MOTION OF AMERICAN FEDERATION OF STATE, COUNTY AND  
MUNICIPAL EMPLOYEES, AFL-CIO (AFSCME) IN RESPONSE TO ORDER  
REGARDING PROCEDURES FOR ATTENDANCE, PARTICIPATION AND  
OBSERVATION OF JULY 25-26, 2018, OMNIBUS HEARING**

The American Federation of State, County and Municipal Employees International Union, AFL-CIO (“AFSCME”) on behalf of itself, and its local affiliates in Puerto Rico, hereby submit this informative motion in response to this Court’s *Order Regarding Procedures for Attendance, Participation and Observation of July 25-26, 2018, Omnibus Hearing [ECF No. 3472]*, and respectfully state as follows:

1. Matthew S. Blumin, Dipesh Patel, and Manuel A. Rodriguez Banchs will appear on behalf of AFSCME at the July 25-26, 2018 hearing regarding the *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

*Puerto Rico for Relief from the Automatic Stay* [Case No. 17-3283-LTS, Docket No. 3418; Case No. 17-3566-LTS, Docket No. 289] filed on July 3, 2018 and AFSCME's *Amended Joinder to (1) the Objection of the Official Committee of Retired Employees of the Commonwealth of Puerto Rico to the ERS Bondholders' Motion for Relief from the Automatic Stay and (2) Debtor's Opposition to Motion of Certain Secured Claimholders of Employees Retirement System of Government of Commonwealth of Puerto Rico for Relief from Automatic Stay* [Case No. 17-3283-LTS, Docket No. 3469; Case No. 17-3566-LTS, Docket No. 294] (the "Joinder") filed on July 10, 2018.

2. Mr. Banchs will appear in person in Courtroom 2 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, PR 00918-1767.

3. Mr. Blumin and Mr. Patel will appear via CourtSolutions on listen-only lines.

4. Mr. Banchs (in Puerto Rico) intends to present argument in connection with the Joinder.

5. AFSCME also appears to respond to any statements made by any party in connection with the above-captioned Title III Proceedings or any adversary proceedings currently pending in the above-captioned Title III Proceedings.

**WHEREFORE**, AFSCME respectfully requests that the Court take notice of the foregoing.

Dated: July 19, 2018

**SAUL EWING ARNSTEIN & LEHR LLP**

By: /s/ Dipesh Patel  
Sharon L. Levine (*pro hac vice*)  
Dipesh Patel (*pro hac vice*)  
1037 Raymond Blvd.  
Suite 1520  
Newark, NJ 07102  
(973) 286-6718 (Telephone)

(973) 286-6818 (Facsimile)

-and-

/s/ Matthew S. Blumin

**AMERICAN FEDERATION OF STATE,  
COUNTY AND MUNICIPAL EMPLOYEES**

Judith E. Rivlin (*pro hac vice*)

Teague P. Paterson (*pro hac vice*)

Matthew S. Blumin (*pro hac vice*)

1101 17th Street NW, Suite 900

Washington, DC 20011

(202) 775-5900 (Telephone)

(202) 452-0556 (Facsimile)

-and-

/s/ Manuel A. Rodriguez Banchs

Manuel A. Rodriguez Banchs

P.O. Box 368006

San Juan, Puerto Rico 00936-8006

(787) 764-8896 (Telephone)

(787) 721-0975 (Facsimile)

*Attorneys for the American Federation of State,  
County and Municipal Employees*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the parties of record.

Dated: July 19, 2018

/s/ Dipesh Patel

Dipesh Patel